

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRUCE RUSH, as a participant in and on behalf of the Segerdahl Corporation employee stock ownership plan, and on behalf of a class of all others who are similarly situated,

Plaintiff,

v.

GREATBANC TRUST COMPANY; MARY LEE SCHNEIDER; RICHARD JOUTRAS; RODNEY GOLDSTEIN; PETER MASON; ROBERT CRONIN; JOHN DOE
DEFENDANTS 1-10; and SEGERDAHL CORP. (d/b/a SG360),

Defendants.

Case No.: 1:19-cv-00738

Judge Andrea R. Wood
Magistrate Judge Susan E. Cox

**PLAINTIFF'S MOTION TO COMPEL CONTINUED RULE 30(b)(6) DEPOSITION OF
DEFENDANT GREATBANC**

Pursuant to Federal Rules of Civil Procedure Rules 30(d)(1) and 37(a), Plaintiff Bruce Rush, by and through undersigned counsel, respectfully moves this Court for an order compelling Defendant GreatBanc to prepare a Rule 30(b)(6) witness on all deposition topics noticed by Plaintiff in Exhibit C to the Declaration of James Bloom, and that the deposition of GreatBanc's Rule 30(b)(6) witness re-open and continue for an additional three hours (not including time for cross-examination).

WHEREFORE, for the reasons set forth in the accompanying memorandum of law and Declaration of James Bloom, Plaintiff respectfully requests that this Court grant this motion and enter the Proposed Order lodged herewith.

Dated: February 4, 2021

Respectfully Submitted,

By: /s/ James A. Bloom
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and Northern District of Illinois Local Rule 5.5, the undersigned, an attorney of record in this case, hereby certifies that on February 4, 2021 a true and correct copy of the foregoing document was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ James A. Bloom
James A. Bloom